

ROB SALTZMAN, ESQUIRE
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085227B

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re:

Mary A. Nelson

DEBTOR

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CASE NO. 19-12351-RG

APPLICATION OF COUNSEL
IN SUPPORT OF CONSENT ORDER

1. I am an attorney, licensed to practice law in the State of New Jersey, am a Member of the law firm of Pluese, Becker & Saltzman, LLC and am responsible for the representation of and authorized to make this Application/Certification on behalf of the Secured Creditor/First Mortgagee, U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2017-C, Mortgage-Backed Notes (collectively, the "Mortgagee") in the above-captioned matter. I make this Certification of my own personal knowledge and predicated upon matters of record as reflected by documents contained in our firm's file.

2. Counsel for the Parties have agreed to clarify the Record by confirming the Automatic Stay does not apply to the Mortgagee.

3. Accordingly, the Mortgagee on behalf of all Parties, respectfully requests that the annexed proposed form of Consent Order to be entered, memorializing the Parties' agreement.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief. I am aware that if any of the foregoing statements are wilfully false, I am subject to punishment.

Respectfully Submitted,

Pluese, Becker & Saltzman, LLC

By: /s/ Rob Saltzman
Rob Saltzman

Attorneys for U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2017-C, Mortgage-Backed Notes

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2C

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File No. 085227B

In Re:

Mary A. Nelson

Case No.: 19-12351-RG

Hearing Date: N/A

Judge: Rosemary Gambardella

**CONSENT ORDER
CONFIRMING STAY NOT IMPOSED**

The relief set forth on the following pages, numbered two (2) through (3) is hereby **ORDERED**.

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Debtor: Mary A. Nelson

Case No: 19-12351-RG

Caption of Order: Consent Order Confirming Stay Not Imposed

This matter having come before the Court on application of the Secured Creditor/Mortgagee, U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2017-C, Mortgage-Backed Notes, by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esq., appearing (the “Mortgagee”), and the Debtor, Mary Nelson, by and through counsel, Walter Nealy, Esq., appearing (the Debtor”) (individually/collectively, the “Party” or “Parties”) having consented hereto and good cause having been shown,

It is, on this ____ day of ____, 2019, UNDERSTOOD, AGREED, STIPULATED, AND ORDERED as follows:

1. Gordon Nelson is the record owner of real property (the “Mortgaged Property”) known as 74 Eppirt St, East Orange, New Jersey 07018. On July 20, 2007 Gordon Nelson executed and delivered to Chase Bank USA, N.A. a promissory note (the “Note”) in the original amount of \$220,000. Simultaneously therewith, as security for the obligations under the Note (the “Debt”), Gordon Nelson and Barbara Nelson (“the Mortgagors”) executed a mortgage (the “Mortgage”) encumbering the Mortgaged Property, recorded on August 14, 2007, in Book 12079, at Page: 7456, Instrument number 7102838. The Debtor herein, Mary Nelson, is not an owner of the Mortgaged Property and is not liable on the Debt evidenced by the Note and secured by the Mortgage.

2. The Debtor will not treat, and will not seek to impair, the Mortgage via the within reorganization; and

3. The Automatic Stay is not imposed upon the Mortgagee by the filing or pendency of the within reorganization; and

4. The Mortgagee and Mortgagor may communicate regarding the Debt and the Mortgagee may avail themselves of their state court rights and remedies pursuant to the loan documents and applicable non-bankruptcy law.

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Debtor: Mary A. Nelson

Case No: 19-12351-RG

Caption of Order: Consent Order Confirming Stay Not Imposed

We hereby consent to the form and entry of the within Order.

PLUESE, BECKER & SALTZMAN, LLC

By: /s/ Rob Saltzman
Rob Saltzman, Esquire
Attorneys for the Mortgagee

WALTER D. NEALY, ESQUIRE

By: /s/ Walter Nealy
Walter Nealy, Esquire
Attorney for the Debtor

RAYMOND & RAYMOND

By: /s/ Kevin de Lyon
Kevin de Lyon, Esquire
Attorneys for Gordon Nelson